

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICOUNITED STATES OF AMERICA  
Plaintiff

v.

[1] WALTER PIERLUISI ISERN  
Defendant, Third-party Plaintiff

v.

Corporacion del Fondo del Seguro  
del Estado (FSE), Gobierno de  
Puerto Rico  
Third- Party Defendant

CIVIL: 3:24-cv-01334-CVR

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## THIRD - PARTY COMPLAINT

## I. The Parties of This Complaint

## a. The Plaintiff :

Name: United States of America  
Address: 350 Carlos Chardón St, Suite 1201  
San Juan, Puerto Rico 00918  
telephone No. (787) 766-5656

## b. The Defendant, Third -Party Plaintiff:

Name: Walter Pierluisi Isern  
Address: P.O. Box 21487, San Juan  
Puerto Rico 00928-1487  
Telephone No. (787) 918-8845

## c. The Third-Party Defendant:

Name: Corporacion del Fondo del Seguro del Estado (FSE)  
Gobierno de Puerto Rico  
Address: P.O. Box 365028 , San Juan  
Puerto Rico, 00936-5028  
Telephone No. (787) 793-5959

## II. INITIAL COMPLAINT

1. On July 25, 2024 the United States Attorney Office for the District of Puerto Rico filed a complaint against co-defendant [1] Walter Pierluisi isern and co-defendant [4] American Management and Administration Corporation to collect the 100% of the amount owed of restitution to the United States of America in the criminal case 3:23-cr-00148-CVR. See exhibit 1.

2. That co-defendant [1] Walter Pierluisi Isern filed an answer to the complaint on December 20, 2024. See exhibit 2.

### III. THIRD -PARTY COMPLAINT

3. That co-defendant [4] American Management And Administration Corporation have a credit in the amount of \$ 263,110.64 for non-utilized premium as to fiscal year 2023, as part of the final liquidation of policy No. 9512002374.

4. That the Third - Party Defendant have to pay to co-defendant [4] American Management And Administration Corporation the non-utilized premium as to fiscal year 2023, as part of the final liquidation the amount of \$ 263,110.64.

5. That money is an account receivable and are part of co-defendant [4] American Management And Administration Corporation assets, that are restrained by this Court due to the " Restraining Order" issued by this Court on July 29,2024.

6. That co-defendant[4] American Management And Administration Corporation are entitled to judgment against the Third-party defendant to collect the amount owed.

7. That co-defendant [1] Walter Pierluisi Isern as owner and shareholder of co-defendant [4] American Management And Administration Corporation is entitled to request to this Court judgment against the Third - Party Defendant and will be economically affected of this Court denied his petition.

8. That co-defendant [1] Walter Pierluisi Isern request to this Court to issue a writ of garnishment against the Third-Party Defendant commanding the Third-Party Defendant to turn over the Plaintiff the amount owed to co-defendant [4] American Management And Administration Corporation to be utilized as part of the restitution payment.

### IV. PRAYER FOR RELIEF

Wherefore, co-defendant [1] Walter Pierluisi Isern prays that this claim deemed

good and sufficient and that after due proceedings are had, that this Court enter judgment against The Third- Party Defendant and in favor of co-defendant [1] Walter Pierluisi Isern., and co-defendant [4] American Management and Administration Corporation to collect the amount of money owed.

#### V. CERTIFICATION

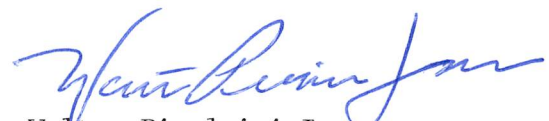
Under Federal Rules of Civil Procedures, by signing below, I certify to the best of my knowledge, information and belief that this complaint: (1) is not being presented for improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by nonfrivolous argument for extending, modifying or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of process will be executed as per Rule 4 of the Federal Rules of Civil Procedures and email addresses available as to all Third-Party Defendant herein.

RESPECTFULLY SUBMITTED,

In, San Juan, Puerto Rico ,on December 20, 2024

  
Walter Pierluisi Isern  
Pro-se Defendant/Third-Party Plaintiff  
P.O. Box 21487, San Juan,  
Puerto Rico 00928-1487  
(787) 918-8845